

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195-SHS

**Exhibits E81-E121  
(nyt-1971-1974-Part32 to nyt-1975-1978-Part34)  
The New York Times Company's First Amended Complaint**

/s/ Ian Crosby

Ian Crosby (*pro hac vice*)  
Genevieve Vose Wallace (*pro hac vice*)  
Katherine M. Peaslee (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
401 Union Street, Suite 3000  
Seattle, WA 98101  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
icrosby@susmangodfrey.com  
gwallace@susmangodfrey.com  
kpeaslee@susmangodfrey.com

Davida Brook (*pro hac vice*)  
Emily K. Cronin (*pro hac vice*)  
Ellie Dupler (*pro hac vice*)  
SUSMAN GODFREY L.L.P.  
1900 Ave of the Stars, Suite 1400  
Los Angeles, CA 90067  
Telephone: (310) 789-3100

Facsimile: (310) 789-3150  
dbrook@susmangodfrey.com  
ecronin@susmangodfrey.com  
edupler@susmangodfrey.com

Elisha Barron (5036850)  
Zachary B. Savage (ZS2668)  
Tamar Lusztig (5125174)  
Alexander Frawley (5564539)  
Eudokia Spanos (5021381)  
SUSMAN GODFREY L.L.P.  
One Manhattan West  
New York, NY 10001  
Telephone: (212) 336-8330  
Facsimile: (212) 336-8340  
ebarron@susmangodfrey.com  
zsavage@susmangodfrey.com  
tlusztig@susmangodfrey.com  
afrawley@susmangodfrey.com  
espanos@susmangodfrey.com

Scarlett Collings (4985602)  
SUSMAN GODFREY L.L.P.  
1000 Louisiana, Suite 5100  
Houston, TX 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
scollins@susmangodfrey.com

Steven Lieberman (SL8687)  
Jennifer B. Maisel (5096995)  
Kristen J. Logan (*pro hac vice*)  
ROTHWELL, FIGG, ERNST & MANBECK, P.C.  
901 New York Avenue, N.W., Suite 900 East  
Washington, DC 20001  
Telephone: (202) 783-6040  
Facsimile: (202) 783-6031  
slieberman@rothwellfigg.com  
jmaisel@rothwellfigg.com  
klogan@rothwellfigg.com

*Attorneys for Plaintiff*  
*The New York Times Company*